

AO91 (Rev. 12/03) Criminal Complaint

AUSA

United States District Court  
Southern District of Texas

## UNITED STATES DISTRICT COURT

FILED

NOV 03 2018

Southern District Of Texas Brownsville Division

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

## CRIMINAL COMPLAINT

vs.

Case Number: B-18-

1059-111

Angel GARCIA  
A215 761 624 United States

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about November 01, 2018 in Cameron County, in the Southern District Of Texas defendant(s) knowingly, willfully, and unlawfully combine, conspire and agree, in reckless disregard of the fact that 2 undocumented alien(s) had entered the United States in violation of law and was then and there present in the United States in violation of law, did transport and move said alien(s) by means of a motor vehicle with intent to further his unlawful presence.

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(v)(I)(ii)I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:

On November 01, 2018 at approximately 2110 hrs. (KAK) 967 RVSS Operator advised Harlingen Border Patrol Agent that Cameron County Constable Precinct #5 was requesting Border Patrol to conduct an immigration inspection on several subjects on FM 2556 north HWY 281 near Santa Maria, Texas. Border Patrol Agent arrived on scene and made contact with Cameron County Constable Deputy. The Deputy advised the Agent that he had two subjects and a driver that needed to be interviewed to determine citizenship. Upon initial contact Border Patrol Agent noticed the passengers' clothing were wet and muddy. Border Patrol Agent interviewed both passengers and the driver of the vehicle which resulted in the apprehension of 2 undocumented immigrants from Honduras and Angel Garcia, a United States Citizen. All 3 subjects were placed under arrest and transported to the Harlingen Border Patrol Station for processing and final disposition.

Continued on the attached sheet and made a part of this complaint:

 Yes  No

Signature of Complainant

Cantu, Isaac Border Patrol Agent

Printed Name of Complainant

Submitted by reliable electronic means, sworn to and signature attested as per Fed. Rules Cr. Proc. 4.1

November 03, 2018

Date

at

Brownsville, Texas

City/State

Ignacio Torteya III  
Name of JudgeU.S. Magistrate Judge  
Title of Judge

Signature of Judge

CONTINUATION OF CRIMINAL COMPLAINT

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Southern District of Texas  
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**AFFIDAVIT**

In support of Criminal Complaint

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Once at the Harlingen Border Patrol Station, Agents initiated a smuggling investigation, discovering through photo lineup, and testimony provided by one individual subject serving as Material Witness, that Angel Garcia was knowingly transporting undocumented aliens for monetary gain.

Submitted by reliable electronic means, sworn to and signature attested  
as per Fed. Rules Cr. Proc. 41

this 3rd day of November, 2018.

Signature of Judicial Officer

*Cantu, Isaac* Border Patrol Agent

Signature of Complainant